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8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 MARIA ZULEYMA JIMENEZ-PAREDES,

15 Defendant.

Case No. 2:24-cr-00036-GMN-EJY-1

**STIPULATION TO CONTINUE  
PRELIMINARY HEARING**  
(Second Request)

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, and Justin J. Washburne, Assistant United States Attorney, counsel for  
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and  
20 Raquel Lazo, Assistant Federal Public Defender, counsel for Maria Zuleyma Jimenez-Paredes,  
21 that the Preliminary Hearing currently scheduled on April 9, 2024, be vacated and continued to  
22 a date and time convenient to the Court, but no sooner than thirty (30) days.

23 This Stipulation is entered into for the following reasons:

24 1. The parties have resolved this matter. It is currently scheduled for a change of  
25 plea and sentencing hearing on April 16, 2024 at 11:00 a.m. This continuance will permit the  
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1 change of plea and sentencing to be held and thereafter for the preliminary hearing to be  
2 vacated.

3 2. The defendant is in custody and agrees with the need for the continuance.

4 3. The parties agree to the continuance.

5 4. Additionally, denial of this request for continuance could result in a miscarriage  
6 of justice.

7 5. The additional time requested herein is not sought for purposes of delay, but to  
8 allow parties to negotiate.

9 6. The additional time requested by this stipulation, is allowed, with the  
10 defendant's consent under the Federal Rules of Procedure 5.1 (d).

11 This is the second request for a continuance of the preliminary hearing.

12 DATED this 27th day of March 2024.

13  
14 RENE L. VALLADARES  
Federal Public Defender

JASON M. FRIERSON  
United States Attorney

15  
16 */s/ Raquel Lazo*  
By \_\_\_\_\_  
17 RAQUEL LAZO  
Assistant Federal Public Defender

*/s/ Justin J. Washburne*  
By \_\_\_\_\_  
JUSTIN J. WASHBURN  
Assistant United States Attorney

## ORDER

DATED this 27th of March 2024.

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